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February 5, 2003

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RECEIVED

FEB - 5 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Dobson Cellular Systems, Inc.*
E911 Quarterly Report – CC Docket No. 94-102

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, (collectively “DCS”), by its attorneys, hereby submit an affidavit and cover letter with original signatures to accompany its E911 Quarterly Report filed on February 3, 2003 pursuant to the Commission's *Order to Stay*.¹ DCS's February 3, 2003 filing included a facsimile version of the attached affidavit.

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lee J. Rosen

Attachment

041-
125-11108

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) (“*Order to Stay*”).

DOBSON CELLULAR SYSTEMS, INC.
14201 WIRELESS WAY
OKLAHOMA CITY, OK 73134
(405) 529-8500

E911 Status – Quarterly Report

February 3, 2003

Summary of Report

Pursuant to the *Order to Stay*,¹ Dobson Cellular Systems, Inc.,² as a Tier II carrier, provides in this Quarterly Report (“Report”) information on all pending requests for Phase I and Phase II services received by DCS, including: the entity requesting service; the date the request was received;³ and the status of the request. For Phase I requests that have been pending for over six months, DCS has also included the projected deployment date (if available), a brief description of the reasons for the delay, and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

DCS has received 69 requests for Phase I services and has activated service in 62 of these jurisdictions. DCS has worked diligently with its third-party location solution vendors, TCS Corp. and Intrado, as well as the public safety community, in coordinating Phase I deployment.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 19 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

DCS’s network consists of approximately 23 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks (“Nortel”), the rest utilizing some Lucent Technologies (“Lucent”) TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August, 2002 and by Nortel by June, 2002.

In addition, DCS has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX as discussed below. In fact, DCS hopes to deploy Phase II services to 100% of the area in Erie County, PA; Genesee County, NY; and Cattaraugus County, NY by the March 2003 deadline or

¹ See *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) (“*Order to Stay*”).

² The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively “DCS”).

³ As indicated in the table, the provided “request date” indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP’s/requesting entity’s request was “valid” per Section 20.18(j) of the rules.

within 6 months of receipt of the Phase II request, and thus exceed its obligations. If the situation does not allow for deployment, however, Dobson intends to work closely with each PSAP to determine an implementation schedule so that Phase II services can commence.

B. Phase II Requests

DCS has received requests for Phase II service from the following five jurisdictions: Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX. On October 3, 2002, the company sent correspondence to the contacts for Erie, Genesee and Cattaraugus Counties, stating that it is tentatively considering each request “valid” and intends to provide Phase II services by March 1, 2003 or within six months of the PSAP’s request, whichever is later. Nevertheless, to ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.⁴ DCS has not yet received a response to its request from these PSAPs, but is proceeding in good faith and has signed a contract with Grayson to provide Phase II capabilities in Erie and Genesee while it awaits response. Furthermore, in Chautauqua County, DCS has also requested that the PSAP provide documentation pursuant to the *Richardson* criteria.⁵ Finally, Austin County recently submitted their Phase II request and DCS expects to submit a similar request for documentation

C. Deployment Issues

As a Tier II provider employing a network-based Phase II solution, pursuant to the *Order to Stay*, DCS intends to provide Phase II service to 100 percent of a requesting PSAP’s coverage area or population beginning March 1, 2003, or within six months, whichever is later. DCS remains committed to meeting these deployment benchmarks in response to valid PSAP requests for Phase II service.

In discussions with Grayson Wireless, however, DCS has learned that leasing and zoning issues may affect DCS’ ability to meet the March 1, 2003 deployment deadline in some markets. Specifically, in order to meet the Commission’s network-based accuracy requirements, Grayson Wireless has informed the company that it may need to install Angle-of-Arrival (“AOA”) antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay

DCS is bringing this to the Commission’s attention as a potential issue that may affect DCS’s ability to provide compliant Phase II services by March 1, 2003. Furthermore, DCS brought similar matters to the Commission’s attention in its original waiver request.⁶ Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁷

⁴ *Id.*

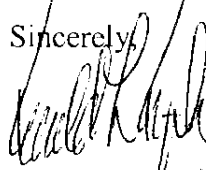
⁵ *Id.*

⁶ See Dobson Cellular Systems, Inc. Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission’s Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁷ See *Order to Stay* at ¶ 41

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over the word "Sincerely,".

Ronald L. Ripley
Vice President *and*
Sr. Corporate Counsel

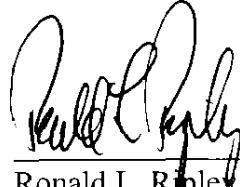
RLR:scd

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of Dobson Cellular Systems, Inc. ("DCS")

I have reviewed the DCS E911 Phase II Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley
Vice President &
Senior Corporate Counsel

Executed on: Feb 3, 2003